

| | | |
|-------------------------------|---|------------------------|
| IN RE: | : | CHAPTER 13 |
| JASON B. HAMILTON | : | |
| CHRISTINE MARIE HAMILTON | : | CASE NO. 1:19-bk-03853 |
| Debtors | : | |
| | : | |
| NATIONSTAR MORTGAGE LLC d/b/a | : | |
| MR COOPER, | : | |
| Movant | : | |
| | : | |
| v. | : | |
| | : | |
| JASON B. HAMILTON | : | |
| CHRISTINE MARIE HAMILTON, | : | |
| Respondents | : | |
| | : | |

1. Admitted.
2. Proof that the mortgage is secured only by a first mortgage on the Debtors' principle residence is demanded at trial and this averment is therefore denied.
3. Admitted.
4. Admitted on information and belief.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions. Denied that Movant is entitled to relief.
6. Admitted.
7. Admitted.
8. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtors' review of payments made.
9. Proof of default is demanded at trial and this paragraph is therefore denied.

10. Proof of the current value of the property is demanded at trial and this averment is therefore denied.
11. Proof that Movant will suffer irreparable harm is demanded at trial and this paragraph is therefore denied.
- (a) Proof of the current value of the property is demanded at trial and this averment is therefore denied.
- (b) Proof of the current value of the property is demanded at trial and this averment is therefore denied.
- (c) The property is the Debtors' home and is essential to the reorganization.
12. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay.
13. Admitted that the note, the mortgage and an assignment of the mortgage are attached.

WHEREFORE, the Debtors respectfully request that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com